

# EXHIBIT A



Patricia Renner - February 6, 2020

1 A P P E A R A N C E S:

2  
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11 BY: JOHN E. RYAN, ESQ.  
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## FEDERAL STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED,  
by and between the parties hereto, through  
their respective Counsel, that the  
certification, sealing and filing of the  
within examination will be and the same are  
hereby waived;

IT IS FURTHER STIPULATED AND AGREED  
that all objections, except as to the form  
of the question, will be reserved to the  
time of the trial;

IT IS FURTHER STIPULATED AND AGREED  
that the within examination may be signed  
before any Notary Public with the same  
force and effect as if signed and sworn to  
before this Court.

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1 for a background check to date?

2 A Well, we do background checks only in  
3 recreation for contractors, but not for solicitation  
4 yet. We've only received one application so far.

5 Q So there were no background checks done from  
6 the years 2017 through 2019?

7 A No.

8 Q There hasn't yet been any background check  
9 done in 2020?

10 A No.

11 Q Are there any other people in other village  
12 departments who might have any job tasks related to  
13 solicitation?

14 A No.

15 Q It's only the village clerk's office  
16 that regulates solicitation?

17 A Correct.

18 Q How many hours did the village spend in tasks  
19 in relating to licensing solicitors in 2017?

20 A Zero.

21 Q What about in 2018?

22 A Zero.

23 Q 2019?

24 A I'm not sure in 2019.

25 Q Can you give me a range of hours?

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1           A           I may have spent some hours developing  
2           the new form. Several hours actually developing  
3           the forms that would be used, but I'm not sure if  
4           it was December or January of this year that I've  
5           been doing that.

6           Q           Would you say two to three hours developing  
7           the form?

8           A           No, longer.

9                       Well, there was the -- the e-mails from  
10          residents to be placed on a do not knock list and the  
11          forms to be used for the applications.

12          Q           Would you say between three and five hours?

13          A           Between December and January I would say at  
14          least seven hours.

15          Q           Between December of 2019 and January of 2020?

16          A           Yes.

17          Q           What about from January through November of  
18          2019, how many hours did the village clerk spend on --

19          A           None.

20          Q           How many hours under the new ordinance does  
21          it take the village clerk's office to create a solicitor  
22          license?

23          A           To create the license? I'm not sure I  
24          understand.

25                       To create the application or to generate the

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1 application?

2 Q After the application is submitted, how many  
3 approximate hours of the village's time does it take  
4 to --

5 A I'm not sure because we haven't gotten any  
6 applications submitted as of yet.

7 Q So there's no way to know one way or the  
8 other?

9 A Correct.

10 Q So we've spoken a little bit about licensing  
11 and you mentioned an application.

12 In 2017 did the village have an application  
13 for a solicitor's license?

14 A No.

15 Q What about in 2018?

16 A No.

17 Q In 2019?

18 A That's when we developed it.

19 Q That was developed in December of 2019?

20 A Yes.

21 Q So from January through November of 2019  
22 there was not an application for a solicitor license in  
23 the village?

24 A From what?

25 Q January through November of 2019.

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1 MR. RYAN: Object to the form of the  
2 question.

3 A There were no commercial solicitation  
4 licenses issued ever since I've been there that  
5 I'm aware of.

6 Q So there's no way to know --

7 A Correct.

8 Q -- what the cost would be --

9 A Correct.

10 Q -- because no commercial solicitation  
11 licenses were issued by the village?

12 A Correct.

13 Q There are certain exemptions in the  
14 ordinance.

15 Do you recall that?

16 A No.

17 Q Certain groups don't have to pay, 'cause I'm  
18 looking at Section C of 171-17.

19 A Yes.

20 Q Do you know how much it cost the village in  
21 2019 to issue a single solicitor license for a member of  
22 a recognized village association of war veterans,  
23 police, firemen, or religious or charitable  
24 organization?

25 A No license fee shall be charged.

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1 Q So you're not aware of any losses to the  
2 budget of the village by issuing licenses to these  
3 exempted groups?

4 A No.

5 Q So in fiscal year 2017 for the village, how  
6 much money did the village spend on enforcement related  
7 to solicitation?

8 A In what year?

9 Q 2017.

10 A I don't know.

11 Q Can you give me an approximation?

12 A I can't recall how many times the code  
13 enforcement were called on a solicitation call or  
14 complaint, so I wouldn't be able to calculate it if I  
15 don't remember how many times it happened.

16 Q Was it more than zero?

17 A I don't know.

18 Q So it could be zero?

19 A It could be zero, it could be more. I'm not  
20 sure.

21 Q What about in 2018, how much did the village  
22 spend on enforcement related to solicitation?

23 A I'm not really sure.

24 Again, anything that I would give you would  
25 be approximate, and I don't really -- I never did a

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1 calculation for it.

2 Q So it could be zero?

3 A Yes.

4 Q What about in fiscal year 2019, how much  
5 money did the village spend on enforcement related to  
6 solicitation?

7 A I don't know an amount. I did not do a  
8 calculation. There were several complaints, however.

9 Q But it could be zero?

10 A It could be.

11 Q So I also notice in this ordinance that  
12 there's a Section 171-19. I'm back on Exhibit 2. It's  
13 entitled posted premises.

14 What does this section mean?

15 A You should not knock or ring the bell on any  
16 premise that has a no knocking or no soliciting sign on  
17 their premises.

18 Q There are no magic words that have to be put  
19 on a sign, it's just the meaning I don't want people to  
20 knock on my door?

21 MR. RYAN: Object to the form of the  
22 question.

23 You can answer.

24 A Can you repeat that, please?

25 Q Sure.

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1 A Okay.

2 Q You have in front of you what we've marked as  
3 Exhibit 4, and this is a proposed Local Law Filing.

4 Have you seen this document before?

5 A Yes.

6 Q Can you identify this document?

7 A This is the Local Law Number 7 of 2019.

8 Q We see from the top line that this Local Law  
9 is being presented to the Village of East Rockaway; is  
10 that accurate?

11 A Yes.

12 Q Can you flip with me to page nine -- or page  
13 eight of eight, excuse me.

14 The September date here, does that sound  
15 about accurate as the time frame for this draft  
16 ordinance?

17 A Yes.

18 Q Did anyone send you this draft before it was  
19 presented to the board of trustees?

20 A Yes, John Ryan does all our local laws for  
21 us.

22 Q So he sent it to you for your input and  
23 comments prior to its presentation at the board of  
24 trustees meeting?

25 A I don't make any comments. He just presents

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1 it to me, we then present it to the board.

2 Q When he presents it to you initially, that  
3 happens at the board meeting; correct?

4 A He e-mails it so that I can make copies for  
5 the board at the board meeting.

6 Q Does he send it to you and do you ever  
7 provide comments on what the language ought to be in the  
8 ordinance draft?

9 A No.

10 Q Has anyone from the village sought your input  
11 on this draft amended ordinance?

12 A No.

13 Q Has anyone asked for your opinion on  
14 the contents of this draft amended ordinance?

15 A No.

16 Q But you're the person in charge of  
17 administering this ordinance as it relates to  
18 solicitation; is that correct?

19 A Yes.

20 Q Do you find it strange at all that nobody  
21 would consult you about this draft amended ordinance?

22 MR. RYAN: Object to the form.

23 Do you understand the question?

24 THE WITNESS: No, not really.

25 Strange, what does that mean?

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1 Q Do you think that as the person who is in  
2 charge of administering this ordinance you should be  
3 consulted about the task that it's going to require your  
4 office to perform?

5 A Yes. If I have comments or if I think there  
6 should be changes, I do make those comments and  
7 recommendations to the board.

8 Q Generally speaking; correct?

9 A Correct, yes.

10 Q But you weren't asked about that in this  
11 instance, were you?

12 MR. RYAN: Objection.

13 Go ahead, you can answer.

14 A They don't generally ask me if I  
15 have comments, I just give the comments. They don't ask  
16 me about it.

17 Q But the village knows that you're the person  
18 or your office is in charge of administering this  
19 ordinance, do they not?

20 A Yes.

21 Q But they don't have a pattern of asking you  
22 about the contents of this ordinance, do they?

23 A No.

24 MR. RYAN: Object to the form of the  
25 question.

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1           You answered.

2           Q       You're the person who would be most  
3 knowledgeable about the expenses that the village incurr  
4 related to solicitation; isn't that right?

5           A       Yes, I would be. I suppose I could be the  
6 person that would be able to figure out how much, yes.

7           Q       You know what these licenses cost to produce,  
8 don't you?

9                   MR. RYAN: Which licenses, Counselor?

10           MR. COWAN: The licenses that are referred to  
11 in this draft amended Local Law at Exhibit 4.

12           A       If asked to give an approximation, then I  
13 could.

14           Q       I want to turn with you in this draft law to  
15 Section 171-2.

16                   Do you see the reference in Section 171-2 to  
17 another village?

18           A       Yes.

19           Q       If you look down with me at subsection  
20 H, do you see in the last sentence of subsection H  
21 that it refers to another village?

22           A       Yes.

23           Q       What village is that?

24           A       Village of Floral Park.

25           Q       Not the Village of East Rockaway;

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1 I know what our fee is. I don't know what  
2 Lynbrook's fees are, I don't know what Valley Stream's  
3 fees are, so I don't know that it was copied. It's  
4 possible, but I don't know that for a fact.

5 Q But you agree with me that you just read a  
6 request for admission?

7 A Yes.

8 Q And the request for admission asked the  
9 village whether it copied its ordinance from Floral  
10 Park, --

11 A Yes.

12 Q -- you agree with me on that?

13 A Yes.

14 Q What was the Village of East Rockaway's  
15 response to that question?

16 A Admit.

17 MR. RYAN: Asked and answered.

18 Q So if East Rockaway copied the ordinance of  
19 Floral Park, that would include copying its fees.

20 Do you agree?

21 A Yes.

22 Q So the fees in the new East Rockaway  
23 ordinance are really just the fees of Floral Park; is it  
24 not?

25 MR. RYAN: Objection to the form of the

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1 question.

2 A Yes.

3 Q When the Village of East Rockaway took the  
4 fees from the Floral Park ordinance, had it done any  
5 studies about how high the fees would be under this new  
6 licensing law?

7 A No.

8 Q Were you asked about the appropriate amount  
9 of the twenty-five dollar process fee and two hundred  
10 dollar license fee that are here in the East Rockaway  
11 ordinance that we looked at earlier?

12 A No.

13 Q So you weren't asked for your input about how  
14 high the fees ought to be?

15 A No.

16 Q Did you ever give an amount that you think  
17 the fee ought to be?

18 A No.

19 Q Do you know why you weren't asked to give  
20 input about the twenty-five dollar process fee and the  
21 two hundred dollar license fee?

22 A I do not set the fees for the village.

23 Q But you are the person most knowledgeable  
24 about what it would cost the village to issue these  
25 licenses; isn't that right?

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1           Q       If you could also look with me, Ms. Renner,  
2       at Exhibit 5, and also turn to the requests for  
3       production section of that document just so we have them  
4       next to each other.

5                   MR. RYAN: Page six.

6           A       Requests for production?

7           Q       Yes.

8                   Number one in the requests for production  
9       that Aptive served, are you aware of any documents or  
10      communications that the village has which would be  
11      responsive to this request number one?

12          A       No, I'm not aware of any.

13          Q       So the village doesn't have any documents or  
14      communications that show any research, studies,  
15      investigations, analyses, accounting reports, memoranda  
16      or other data related to the processing costs that the  
17      village has for solicitor licenses?

18          A       No.

19          Q       I'm on number two now.

20                   Are you aware of any documents or  
21      communications that show any research or studies or  
22      investigations or analyses or accounting reports or  
23      memoranda or other data that the village has that are  
24      related to the costs that it incurs for enforcing  
25      Chapter 171 of the village code?

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1 A No.

2 Q Number three, are you aware of any documents  
3 or communications that would show the village's  
4 procedure for conducting a criminal background check?

5 A No.

6 Q As to RFP number four, are you aware of any  
7 documents and communications that the village has which  
8 relate to your procedures in investigating an applicant  
9 for a solicitor's license?

10 A No.

11 Q As to RFP number five, does the village have  
12 any documents or communications that it considered in  
13 determining the two hundred dollar fee amount?

14 A No.

15 Q As to RFP number six, does the village have  
16 any documents or communications that it considered in  
17 determining the twenty-five dollar process fee?

18 A No.

19 Q As to RFP number seven, does the village have  
20 any documents or communications that would show its  
21 total expense incurred in 2018 for licensing solicitors?

22 A We're on number eleven?

23 Q We're on number seven.

24 A Sorry.

25 Q No problem.

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1 A No.

2 Q Just to be clear, the village doesn't have  
3 any documents or communications that would show its  
4 total expenses in 2018 for licensing solicitors?

5 A Correct.

6 Q What about as to RFP number eight, does the  
7 village have any documents or communications which would  
8 show its total expenses in 2019 for --

9 A No.

10 Q -- licensing solicitors?

11 Still no?

12 A No.

13 Q What about as to RFP number nine, does the  
14 village have any documents or communications that are  
15 related to or concern its determination of the two  
16 hundred dollar fee amount?

17 A No.

18 Q As to RFP number ten, does the village have  
19 any documents or communications that are related to its  
20 determination of a twenty-five dollar process fee in the  
21 new ordinance?

22 A No.

23 Q As to RFP number eleven, does the village  
24 have any documents or communications that relate to or  
25 concern the village's drafting, consideration or passage

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1 of Local Law Number 7 to amend Chapter 171?

2 A No.

3 Q As to RFP number one, did the village do any  
4 research or studies or investigations or analyses or do  
5 any accounting reports or furnish any memoranda or  
6 compile any data related to its processing costs  
7 incurred by the village to license solicitors?

8 A No.

9 Q Related to number two, does the village have  
10 any documents or communications that reflect any  
11 research, studies, investigations, analyses or  
12 accounting reports, memoranda or other data that it  
13 considered or that relate to the costs incurred by the  
14 village to enforce Chapter 171 of the village code?

15 A No.

16 Q Does the village have any documents or  
17 communications which would show its procedure for  
18 conducting criminal history or background checks on  
19 applicants for solicitor licenses?

20 A No.

21 Q Does the --

22 MR. RYAN: Just a second. Didn't we  
23 just go through this?

24 MR. COWAN: We did, but I'm talking  
25 about any documents that the village has.

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1 MR. RYAN: I thought you just went  
2 through this in the prior set of questions.

3 MR. COWAN: You can put your objection on the  
4 record if you want.

5 MR. RYAN: You're just asking the same  
6 question.

7 MR. COWAN: Do you want to object?  
8 You're not asking me questions, that's not  
9 how it works, as you know.

10 Do you want to object?

11 MR. RYAN: I guess I'm objecting.

12 He's asking the same questions again.  
13 I'd ask him not to ask the questions again,  
14 but it's your game.

15 MR. COWAN: Thank you.

16 Q Does the village have any documents or  
17 communications which relate to the village clerk's  
18 procedures for processing and investigating applications  
19 for solicitors licenses?

20 A No.

21 Q Does the village have any documents or  
22 communications at all that it considered in determining  
23 the two hundred dollar license fee amount?

24 A No.

25 MR. COWAN: Thank you. You can put

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1 A Yes.

2 Q It states here that the application for a  
3 license shall be in writing.

4 Do you agree?

5 A Yes.

6 Q It also has to be addressed to the clerk.  
7 Do you also agree with that?

8 A Yes.

9 Q It also gives some information that must be  
10 included in the application.

11 Do you see that?

12 A Yes.

13 Q That information is listed out in subsections  
14 A through J.

15 Are you with me?

16 A Yes.

17 Q Does the village currently have an electronic  
18 or paper application for a solicitor's license?

19 A Yes.

20 Q Where might an applicant find that  
21 application?

22 A You can request it in the clerk's office.  
23 I'm not sure if we have it on line yet, because we're  
24 still in the process of developing the solicitor's  
25 application and procedures.

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1           As I stated before, we've never issued any  
2 prior -- have not issued one yet since I'm in the  
3 village other than the non-for-profit, which just was a  
4 letter.

5           Q       Was there a reason why the village never  
6 previously gave licenses to for-profit solicitors?

7           MR. RYAN: Objection.

8           You can answer.

9           A       There were never any requests for it. We've  
10 never received a request for it.

11          Q       Was there a policy against allowing it?

12          A       No, just never received any solicitors  
13 requesting it other than the non-for-profits or  
14 canvassing.

15          Q       In Section 171-2, the information that's  
16 listed here in A through J, is all that information  
17 requested on the current application that's been  
18 recently developed?

19          A       I believe, I believe we have everything but  
20 the vehicles that would be used in solicitation on the  
21 application. I missed that.

22          Q       Is the application still in draft form or can  
23 an applicant get it right now?

24          A       They can get it. We've sent one out to an  
25 applicant. As a result of a complaint, I sent one out

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1 to Altice.

2 Q Who is Altice?

3 A Cablevision.

4 Q So they were a company going door to door in  
5 the village?

6 A Correct.

7 Q As you look through here at Section 171-2, do  
8 you see any additional information that's included in  
9 the new application that is not present here in the  
10 ordinance?

11 A No.

12 Q So the village is not requesting any  
13 information beyond what is here in the ordinance?

14 A Correct.

15 Q Currently if someone wanted to apply for a  
16 solicitor license in the village, what would that person  
17 have to do?

18 A They'd have to request an application and  
19 they would be sent a cover letter with the application,  
20 and then once it's sent back into the village, then it  
21 would be reviewed by the board.

22 Then we'd have to go through the procedures,  
23 background check and review, and then have to send them  
24 either a permit or -- which we haven't even made up the  
25 permit yet, because this is brand new, and then -- oh,

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1 and they would have to show us too whether they're, you  
2 know, the corporation or a -- if they're there as the  
3 non-for-profit, and then they would get the permit.

4 Q Will the permit --

5 A And I'm sorry I'm stuttering a little, it's  
6 because we haven't done it yet, so I'm kind of just  
7 muddling through.

8 Q Understood.

9 Thank you for answering my questions, by the  
10 way.

11 Do you think that the license itself, the  
12 hard copy license, will be available by the fall of this  
13 year?

14 A Yes. I see no reason why it wouldn't be.

15 Q I want you to turn with me to subsection J in  
16 that same section, and it says here such other  
17 information as the board of trustees may require.

18 What do you take that section to mean?

19 A That the board might require some additional  
20 information and we would request it in writing. After  
21 reviewing, if they have any questions regarding what's  
22 maybe not clear what goods they're going to be  
23 soliciting, et cetera.

24 Q Anything else?

25 A I can't think of anything.

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1 you've mentioned today?

2 A Well, there's the e-mail that I would  
3 receive, there's the e-mail -- then there's the e-mail  
4 in response, and then there's adding the person's  
5 information onto the list.

6 Q So that's the ten to fifteen minute process  
7 we discussed earlier?

8 A Yes.

9 Q And the village clerk's office has only done  
10 or only sent the no knock list to one prospective  
11 solicitor; is that correct?

12 A Yes.

13 Q So the fifty to seventy-five dollar figure is  
14 just a guess from the village, is just an estimate of  
15 the cost to the village it would incur?

16 MR. RYAN: Objection to form.

17 You can answer.

18 A It's an approximation, yes.

19 Q Did you make that approximation or did  
20 somebody else come up with that figure?

21 A That was -- yeah, that was a figure that was  
22 given to me.

23 Q It was given to you by someone else?

24 A Yes.

25 Q Does the village have any documents or other

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1 one hundred dollars, at least. My time, the board's  
2 time, the denial letter, those all are costs that we  
3 incur.

4 So, no, twenty-five dollars is not the total  
5 cost of that.

6 Q What do you think the total cost is?

7 A Approximately?

8 Q Yes.

9 A Two hundred dollars.

10 Q Has the village ever licensed a solicitor  
11 before?

12 A No.

13 Q So what basis --

14 A I'm using approximate in all my answers  
15 because we have not done it. So we're approximating the  
16 costs. We don't know for sure what the costs are until  
17 we have one that we can process fully through the  
18 application, and I don't know what the failure to pass  
19 and be disapproved is because we haven't done that.

20 I'm approximating, I'm guessing. I'm not --  
21 I don't know for sure because we haven't done it.

22 Q The two hundred dollar fee is a guess?

23 MR. RYAN: Object to the form of the  
24 question.

25 You can answer.

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1 to cover the cost caused by somebody who's violating the  
2 ordinance?

3 MR. RYAN: Object to the form of the  
4 question.

5 You can answer.

6 A Would that be enough is the question?

7 Q To cover the cost of code enforcement.

8 A I believe that would be enough.

9 Q Can you look with me, please, at Exhibit 6.  
10 Can you turn with me, please, to the village's response  
11 to interrogatory number five. Just let me know when  
12 you're there.

13 A I'm there.

14 Q Do you agree, or does the village agree that  
15 it costs it one hundred dollars, approximately, to do a  
16 criminal background check for a solicitor's license  
17 application?

18 A Approximately, yes.

19 Q For what reasons?

20 A For what reasons?

21 Q Yes.

22 A Because we would have to hire a company to do  
23 that. So that cost is something that the company we  
24 hire would receive and charge.

25 Q What company does the village plan to hire?

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1 A I don't have a company as of yet.

2 Q Has the village taken estimates from  
3 different background check companies about what the cost  
4 is?

5 A No, not yet.

6 Q Will the village be using a private  
7 investigator to do the background checks for solicitor  
8 applicants?

9 A I don't know. We haven't discussed that yet.

10 Q Will the background check involve  
11 fingerprinting?

12 A I don't know.

13 Q So the village doesn't currently have any  
14 evidence to support its view that a background check  
15 costs a hundred dollars per applicant?

16 MR. RYAN: Object to the form of that  
17 question.

18 You can answer it.

19 A No.

20 Q Why did the village decide to implement a  
21 background check for solicitor applicants?

22 A People knock on residents doors. You want to  
23 make sure that people in your neighborhood are -- don't  
24 have any bad things in their background.

25 Q Did the village receive any reports that

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1 asked and answered.

2 You may answer.

3 A The enforcement personnel for each  
4 application, which we only had one, so it's an  
5 approximate, it's not a definitive, and you have to keep  
6 -- for every application that we -- well, the one  
7 application that we've had so far has been as a result  
8 of a complaint from a resident which then generated code  
9 enforcement.

10 So I'm not going through the phonebook  
11 looking for solicitors. I'm going based on complaints  
12 from residents. So that generates a code enforcement  
13 response. So that's a salary for the code enforcement  
14 person, and Tom Smith, the supervisor of the code  
15 enforcement, they're being utilized.

16 Q So Mr. Smith supervises and then there's a  
17 full-time individual; correct?

18 MR. RYAN: Objection. Asked and answered.  
19 You can answer.

20 A Yes.

21 Q And then four part-time, is that also  
22 correct?

23 A Yes.

24 Q What research did the village do about  
25 the cost of enforcement of its solicitation code

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1 prior to setting the two hundred dollar fee?

2 MR. RYAN: Object to the form of the  
3 question.

4 A Yeah, I'm not really sure that I can follow  
5 that.

6 Q Did the village research the cost of  
7 enforcement relative to solicitation before it set this  
8 two hundred dollar fee?

9 A No.

10 Q Have there been any reports from the code  
11 enforcement department about how much cost they've  
12 incurred related to solicitation?

13 A No.

14 Q Who enforces Chapter 171 of the village code?

15 MR. RYAN: Objection. It's asked and  
16 answered.

17 A Well, I oversee, and the superintendent of  
18 buildings is the one who would send out code  
19 enforcement, or he would go out on his own himself. He  
20 has more recently gone out himself rather than send  
21 someone.

22 Q Sometimes will the Nassau County Police  
23 Department also be enforcing Chapter 171?

24 MR. RYAN: Objection to the form.

25 A Nassau County Police Department does not

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1 don't know why they're charging less.

2 Q Just to be clear, the village is only  
3 guessing about what its administrative costs would be  
4 with respect to solicitor licenses?

5 MR. RYAN: Object to the form of the  
6 question.

7 You can answer.

8 A We're approximating.

9 Q But it has not done any studies --

10 A Correct.

11 Q -- to support it's approximation?

12 MR. RYAN: Object to the form of the  
13 question. Asked and answered.

14 You can answer.

15 A Correct.

16 MR. COWAN: I'm going to look at another  
17 town's solicitation notice. This will be Exhibit  
18 10.

19 (Whereupon, Peddlers and Solicitors Ordinance  
20 was marked as Plaintiff's Exhibit 10 for  
21 identification, as of this date.)

22 Q This is Exhibit 10. This is the solicitation  
23 ordinance of the Village of Valley Stream.

24 How far away is the Village of Valley Stream  
25 from East Rockaway?

1 C E R T I F I C A T I O N

2

3 I, DEBORAH THIER, a Notary Public  
4 of the State of New York do hereby certify:

5 That the testimony in the within  
6 proceeding was held before me at the aforesaid  
7 time and place. That said witness was duly sworn  
8 before the commencement of the testimony, and that  
9 the testimony was taken stenographically by me,  
10 then transcribed under my supervision, and that  
11 the within transcript is a true record of the  
12 testimony of said witness.

13 I further certify that I am not related  
14 to any of the parties to this action by blood or  
15 marriage, that I am not interested directly or  
16 indirectly in the matter in controversy, nor am I  
17 in the employ of any of the counsel.

18 IN WITNESS WHEREOF, I have hereunto set  
19 my hand this 18th day of February, 2020.

20

21



22

DEBORAH THIER

23

24

25